

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
Vs.)	Criminal No. 04-10047 RCL
)	
LUIS RODRIGUEZ,)	
A/K/A "One Eyed Luis")	
_____)	

**RODRIGUEZ'S EXPEDITED MOTION
FOR HIS COUNSEL TO
ATTEND MEDICAL EXAM**

Luis Rodriguez has been informed by Dr. Paul Gross, the Court's medical expert, that he will be examined on April 6, 2006 at 7:30 a.m. at the Lahey Clinic in Burlington, Massachusetts. By this Motion, Rodriguez requests that his counsel be present at the examination. One of the reasons for his request is to more effectively communicate with Dr. Gross. Rodriguez is experiencing significant memory problems and wants to ensure that he does not forget to tell Dr. Gross all his symptoms. Because he has told his counsel his symptoms, he wishes her to assist in communicating with Dr. Gross. Another reason for his request is that Dr. Gross is the Court's expert and not Rodriguez's and Rodriguez wants his counsel at the examination to represent him.

Counsel for Rodriguez and the Government have conferred with respect to this Motion and are unable to reach agreement.

LUIS RODRIGUEZ
By his attorney,

/s/ Valerie S. Carter
Valerie S. Carter
Carter & Doyle LLP
530 Atlantic Avenue
Boston, MA 02210

617-348-0525

DATED: April 3, 2006

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2006 a true copy was hand delivered to Clerk and ECF Filed, and a copy of the above document was served upon U.S. Attorney of record and Pre-Trial Services via ECF-mailing.

/s/ Valerie S. Carter
Valerie S. Carter, Esq.